

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

**STATE OF OKLAHOMA, ex rel.
W. A. DREW EDMONDSON, in his capacity as
ATTORNEY GENERAL OF THE STATE OF
OKLAHOMA and OKLAHOMA SECRETARY
OF THE ENVIRONMENT C. MILES TOLBERT,
in his capacity as the TRUSTEE FOR NATURAL
RESOURCES FOR THE STATE OF OKLAHOMA,**

Plaintiffs,

vs.

**TYSON FOODS, INC., TYSON POULTRY, INC.,
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,
AVIAGEN, INC., CAL-MAINE FOODS, INC.,
CAL-MAINE FARMS, INC., CARGILL, INC.,
CARGILL TURKEY PRODUCTION, LLC,
GEORGE'S, INC., GEORGE'S FARMS, INC.,
PETERSON FARMS, INC., SIMMONS FOODS,
INC., and WILLOW BROOK FOODS, INC.,**

Defendants.

**05-CV-0329 JOE-TCK
JURY TRIAL
DEMANDED**

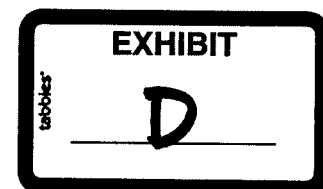
**DEFENDANT TYSON CHICKEN, INC.'s FIRST SET OF INTERROGATORIES
TO PLAINTIFFS**

Defendant Tyson Chicken, Inc. (hereinafter "Tyson"), pursuant to Fed.R.Civ.P. 33, requests that the Plaintiffs provide written responses to the following interrogatories fully in writing under oath, within thirty (30) days of receipt of same.

INSTRUCTIONS

The following instructions shall apply to these Interrogatories:

1. These interrogatories shall be deemed continuing pursuant to Federal Rules of Civil Procedure to require supplemental responses if the Plaintiffs directly or indirectly acquire additional information between the time the answers are served and the



injured by or become contaminated with hormones disposed of or released by the Tyson Defendants or any person or Entity for which the Tyson Defendants may allegedly be held legally responsible.

INTERROGATORY NO. 4: Please Identify all reports, studies, Publications, research, sampling data or monitoring data which demonstrates or which the State believes tends to demonstrate that the soil, water, sediments or biota in the IRW has been injured by or become contaminated with microbial pathogens disposed of or released by the Tyson Defendants or any person or Entity for which the Tyson Defendants may allegedly be held legally responsible.

INTERROGATORY NO. 5: Please Identify all reports, studies, Publications, research, modeling, sampling data or monitoring data which assesses or purports to assess the relative contributions (whether expressed in percentages, pounds, tons or other units) of any or all the defendants named in this Lawsuit to any injury, loss, damage, destruction, impairment or endangerment to the natural resources within the IRW due to the alleged release or disposal of phosphorus/phosphorus compounds, nitrogen/nitrogen compounds, arsenic/arsenic compounds, zinc/zinc compounds, cooper/cooper compounds, hormones or microbial pathogens.

INTERROGATORY NO. 6: Please Identify all reports, studies, Publications, research, sampling data or monitoring data which You contend establishes or tends to establish the contamination, degradation, pollution or any other adverse impact upon any Water Body in the IRW as result of the release of phosphorus or phosphorus compounds.

CERTIFICATE OF SERVICE

I hereby state that I have caused to be served via first class U.S. Mail, a true and correct copy of the above and foregoing, on this 2nd day of May 2006, to:

C. Miles Tolbert Secretary of the Environment State of Oklahoma 3800 N. Classen Oklahoma City, OK 73118	Mr. John Elrod Ms. Vicki Bronson CONNER & WINTERS, PC 211 W. Dickson Fayetteville, AR 72701
Tim K. Baker BAKER & ASSOCIATES 303 W. Keetoowah Tahlequah, OK 74464	Mr. James M. Graves Gary V. Weeks BASSETT LAW FIRM, LLP P.O. Box 3618 Fayetteville, AR 72702-3618
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